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January 17, 2025

By ECF

The Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Gannon Bond*, 24 Cr. 091 (GHW)

Dear Judge Woods:

This letter is respectfully submitted to request that the Court temporarily modify the conditions of Mr. Bond's release to permit him to travel to Portland, Oregon from January 23, 2025, through January 27, 2025, in order to visit his mother. As the Court may recall, Mr. Bond's mother lives in Oregon and posted her property to secure his appearance bond. The address has been provided to Pretrial Services and the Government.

Pretrial Services and the Government have no objection to this request provided Mr. Bond provide his flight itinerary in advance of departure.

Thank you for your consideration.

Respectfully submitted,

/s/ James Kousouros
James Kousouros, Esq.
Counsel for Mr. Bond

Cc. All Counsel of Record (By ECF)

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